EXHIBIT 1

18-23538-shl Doc 391-1 Filed 10/31/18 Entered 10/31/18 17:38:47 Exhibit 1 - Formal Reclamation Demand Letter Pg 2 of 3

THOMPSON ATLANTA CLEVELAND DAYTON WASHINGTON, D.C.
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October 31, 2018

Via Email and Overnight Mail

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Attn: Ray C. Schrock, P.C., Jacqueline Marcus, Garrett A. Fail and Sunny Singh

Via Overnight Mail

Sears Holding Corporation 3333 Beverly Road Hoffman Estates, IL 60179

Re: In re Sears Holding Corporation, et al., 18-23538 (RDD) (Bankr. S.D.N.Y) Demand for Reclamation Pursuant to 11 U.S.C. § 546(c)

Ladies and Gentlemen:

Our firm represents Marsala Manufacturing Co. and The Marfo Company ("Claimant"), a creditor in the above-captioned bankruptcy cases of Sears Holding Corporation and its affiliates (collectively, the "Debtors").

Pursuant to Uniform Commercial Code § 2-702 and 11 U.S.C. § 546(c), Claimant hereby demands on the Debtors for the reclamation and return of all goods that were shipped to the Debtors by Claimant, where such goods were received by the Debtors within forty-five (45) days preceding the commencement of the Debtors' bankruptcy cases filed on October 15, 2018 (the "Reclamation Period"). During the Reclamation Period, Claimant delivered goods having an agreed price and reasonable value totaling \$535,412.64 as detailed on Appendix 1, enclosed herewith.

Claimant hereby demands that all goods subject to Claimant's reclamation rights, including goods received during the Reclamation Period but not referenced herein, be segregated and protected by you from any other goods in your possession and that you provide an immediate accounting of all such goods on-hand and their present location(s). Such goods shall not be used for any purpose whatsoever except those specifically authorized by the Bankruptcy Court following notice and a hearing thereon.

Jennifer.Maffett-Nickelman@ThompsonHine.com Fax: 937.443.6637 Phone: 937.443.6804

JM:jm 4814-7031-3593.1

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Claimant makes this demand for reclamation without prejudice to all other rights and remedies available to it, at law or in equity, including, but not limited to, its right to an allowed administrative expense claim under 11 U.S.C. § 503(b)(9) or any other provision of the Bankruptcy Code and/or its right to amend and supplement this demand and to serve and file additional demands or claims.

Please forward all communications concerning the matters discussed herein to my office as counsel for Claimant. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Jennifer L. Maffett-Nickelman

Encl.